

JEROME C. ROTH (State Bar No. 159483)  
jerome.roth@mto.com

MIRIAM KIM (State Bar No. 238230)  
miriam.kim@mto.com

MUNGER, TOLLES & OLSON LLP  
560 Mission Street  
Twenty-Seventh Floor  
San Francisco, California 94105-2907  
Telephone: (415) 512-4000  
Facsimile: (415) 512-4077

BRAD D. BRIAN (State Bar no. 079001)  
brad.brian@mto.com  
WILLIAM D. TEMKO (State Bar No. 98858)  
william.temko@mto.com  
E. MARTIN ESTRADA (State Bar No. 223802)  
martin.estrada@mto.com

CLAIRE YAN (State Bar No. 268521)  
claire.yan@mto.com  
MUNGER, TOLLES & OLSON LLP  
355 South Grand Avenue  
Thirty-Fifth Floor  
Los Angeles, CA 90071-1560  
Telephone: (213) 683-9100  
Facsimile: (213) 687-3702

*Attorneys for Defendants LG Electronics, Inc.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC

MDL No. 1917

This Document Relates to:

*Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,*  
No. 11-cv-05513

**DECLARATION OF CLAIRE YAN IN  
SUPPORT OF DEFENDANTS'  
ADMINISTRATIVE MOTION TO SEAL**

*Best Buy Co., et al. v. Technicolor SA, et al.,*  
No. 13-cv-05264

[Administrative Motion to Seal and [Proposed]  
Order filed concurrently herewith]

*Sears, Roebuck and Co. and Kmart Corp. v.*  
*Technicolor SA, No. 3:13-cv-05262*

Judge: Hon. Samuel Conti  
Date: None Set  
Ctrm: 1, 17<sup>th</sup> Floor

*Sears, Roebuck and Co. and Kmart Corp. v.*  
*Chunghwa Picture Tubes, Ltd., No. 11-cv-*  
*05514*

1 *Sharp Electronics Corp., et al. v. Hitachi Ltd.,*  
2 *et al.*, No. 13-cv-1173

3 *Sharp Electronics Corp., et al. v. Koninklijke*  
4 *Philips Elecs., N.V., et al.*, No. 13-cv-2776

5 *Siegel v. Hitachi, Ltd.*, No. 11-cv-05502

6 *Siegel v. Technicolor SA*, No. 13-cv-05261

7 *Target Corp. v. Chunghwa Picture Tubes,*  
8 *Ltd.*, No. 11-cv-05514

9 *Target Corp. v. Technicolor SA*, No. 13-cv-  
10 05686

11 *ViewSonic Corporation v. Chunghwa Picture*  
12 *Tubes Ltd.*, No. 14-cv-2510

1 I, Claire Yan, declare:

2 1. I am an attorney with the law firm Munger, Tolles & Olson LLP, counsel of record  
3 for Defendant LG Electronics, Inc. ("LGE") in the above entitled action. I am licensed in the State  
4 of California and admitted to practice before this Court. I make this declaration based on my  
5 personal knowledge and, if called upon as a witness, could and would testify competently as to the  
6 matters set forth below.

7 2. Pursuant to Civil Local Rule 7-11 and 79-5, I make this declaration in support of  
8 the LGE Defendants' Administrative Motion to Seal.

9 3. LG seeks permission to file under seal the highlighted portions of the sealed  
10 version of Defendants' Reply in Support of Motion *In Limine* No. 8 to Exclude Evidence or  
11 Argument Relating to Damages From "Spillover" or "Ripple" Effects of Foreign Price-Fixing  
12 Activities on U.S. Prices.

13 4. Highlighted portions referenced above contain discussion, analysis, references to,  
14 or information taken directly from, material designated by a Party in this matter as "HIGHLY  
15 CONFIDENTIAL" under the Stipulated Protective Order (Dkt. No. 306) in this case.

16 5. LGE seeks to submit the above material under seal in good faith in order to comply  
17 with the Stipulated Protective Order in this action and the applicable Local Rules. Because the  
18 information LGE seeks to submit under seal has been designated as Highly Confidential by other  
19 parties, LGE is filing the accompanying Administrative Motion, and will be prepared to file an  
20 unredacted version of the above-referenced documents in the public record if required by Civil  
21 Local Rule 79-5(e).

22 I declare under penalty of perjury under the laws of the United States that the foregoing is  
23 true and correct.

24 Executed on March 6, 2015, in Los Angeles, California.

25  
26 /s/ Claire Yan

27 CLAIRE YAN  
28